



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Mountain  
Plains  
Region

1244 Speer Boulevard  
Denver, CO 80204

Reply to  
Attn. of:

SP 94-C-42

NOV 8 1993

Subject: Direct Certification

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa, Kansas, Missouri ED,  
(Special Nutrition Programs) Montana OPI, Nebraska ED, North Dakota,  
South Dakota, Utah, Wyoming ED

This policy and guidance is issued pending clearance of a final rule which will authorize direct certification on an on-going basis.

The following provisions are required:

1. Documentation for those children certified as eligible by direct certification which includes (a) the names of children from households currently certified to receive food stamps, Food Distribution Program on Indian Reservations (FDPIR) benefits, or Aid to Families with Dependent Children (AFDC); b) specific identifying information, such as each child's birth date, address, social security number, parents' names, or other appropriate personal identifiers, which can be used to establish a match between a child eligible for food stamps, FDPIR, or AFDC benefits with a child who is a student in the school food authority (SFA); c) the signature of the responsible official certifying that the children are members of households currently certified to receive food stamps, FDPIR, or AFDC benefits; d) the date of the signature. It is important that all of these elements be included on the certification statement. Failure to include them could result in disallowance of meals and recovery of reimbursement during a review or audit. With respect to the signature of the food stamp/FDPIR/AFDC official, we recognize that in some cases, such as on form letters to households or direct computer matches, the certifying official's original signature may not be available. In these instances, sufficient documentation must be available for a reviewer or auditor to ascertain that the certification that the children are members of a food stamp or FDPIR household or AFDC assistance unit was provided upon the authority of a State or local food stamp, FDPIR or AFDC official. Such documentation could include correspondence or a written agreement between the food stamp, FDPIR or AFDC office and the SFA setting out or confirming the manner in which school officials would be provided the children's food stamp, FDPIR or AFDC status.
2. Documentation, as described above, retrievable by school.
3. A notice to each household certified as eligible through direct certification advising them that (a) their children are eligible for free meals or free milk, as appropriate; (b) no further application is required; (c) the household should notify the school if they do not want their children to receive free benefits; and (d) the household must notify the school when they are no longer certified to receive food stamps, FDPIR or AFDC benefits.

4. The distribution of letters/notices and applications to households of all children at the beginning of the school year to prevent overt identification and to ensure that no child is inadvertently excluded from participation. However, SFAs that implement direct certification are not required to send the letter/notice and application to those households eligible under direct certification if these materials are distributed to all other households through the mail, individual student packets or by any other means which prevents the overt identification of children eligible through direct certification. Under this option, households will receive either a parent letter/notice with an application form, or a letter notifying them that their children are eligible for free benefits.

This guidance allows the implementation of direct certification in any of several different ways. For example, SAs or SFAs may accomplish direct certification by means of a computer match in which computerized lists of names of children from food stamp/FDPIR/AFDC households, along with identifying information, is provided by a State or local food stamp/FDPIR/AFDC agency to the State or local education agency and matched against a list of names and other identifying information of school children. This also could be accomplished by a procedure in which the SFA would provide a list of all the students enrolled in the SFA, along with identifying information, to the food stamp/FDPIR/AFDC agency, in order to have the agency match the information to children who were members of households receiving food stamps/FDPIR/AFDC benefits. The feasibility of computer-aided matching would depend, of course, on the sophistication of the computer systems involved and the information maintained by both the food stamp/FDPIR/AFDC agency and the SFA.

Some food stamp/FDPIR/AFDC offices are providing their recipients who have school-aged children with a letter to take to school which contains all the necessary eligibility documentation for direct certification. In such cases, the information provided by the office on the form should be sufficient to document children's eligibility (including identifiers), and the household itself should not enter any of this information directly on the form.

We emphasize the following:

- A) SFAs must have SA approval prior to implementing eligibility determinations based on direct certification. Such approval by the SA must come after the SFA's procedures have been reviewed by the SA and found to be in conformity to the guidance.
- B) Documents from State or local food stamp/FDPIR/AFDC offices certifying children as members of current food stamp or FDPIR households or AFDC assistance units need not have an official authorizing signature in every case if sufficient documentation establishes the certifying arrangement between the food stamp/FDPIR/AFDC office and the SFA. See item number 1, above.

- C) SFAs are not required to distribute letters/notices and applications for children whose eligibility is established through direct certification if the SFA's method for distributing letters/notices and applications to all other children prevents overt identification of children eligible through direct certification (in item 4, above).
- D) In situations in which the SFA sends a list of students to the food stamp/FDPIR/AFDC office in order to have the latter match students with those children currently certified in food stamps, FDPIR or AFDC households the SFA must list all its enrolled students, not simply ones which have been, or are considered likely to be, eligible in the free category.

If you have any questions, please do not hesitate to contact our office.

*Ann C. Hector*

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